

Exhibit B

~~CERTIFIED COPY~~

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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5 KASSONDRA BAAS and KELLY)
6 LOFQUIST, individually)
and on behalf of all)
7 others similarly situated,) No. C 07-03108 JSW (ENE)
8 Plaintiffs,)
9 vs.)
10 DOLLAR TREE STORES, INC.,)
11 Defendants.)
12

13 DEPOSITION OF RICHARD A. TELLSTROM
14

15 Held at the Offices of
16 Verbatim Reporting Service
17 141 Stony Circle, Santa Rosa, California
18 Tuesday, November 13, 2007, 9:45 a.m.
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Verbatim

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1 A. Rohnert Park, California, all the way to

2 Crescent City.

3 Q. How many stores do you currently have in your

4 district?

5 A. 12.

6 Q. Is one of those stores a new store?

7 A. Yes. 3770, Eureka.

8 Q. When did 3770 open, approximately?

9 A. Oh, August.

10 Q. Of 2007?

11 A. Yes.

12 Q. Does a store manager at a new store, at a

13 store that's opening, have additional

14 responsibilities?

15 A. Probably a little bit more hiring and

16 teaching and developing with their people. Sure.

17 Working with the store coordinator might be the

18 first time they've ever had to deal with that.

19 Q. What does a store coordinator --

20 A. Store coordinator comes in and sets up the

21 store with the store manager. Sets -- gets the

22 store ready for grand opening.

23 Q. So store coordination is a function of a new

24 store --

25 A. Yes.

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1 each store specifically as far as what -- what the

2 nuts and bolts of it was for that week.

3 Q. How do you communicate that to your store

4 managers now?

5 A. Normally talk to them on Mondays as far as

6 their week and what the sales are. And like I said,

7 they've -- before, we weren't to leave that with the

8 store managers, and now we are able to.

9 Q. Are those normally phone calls you have with

10 your store managers on Monday, or could it be either

11 a visit --

12 A. Just a visit during the week.

13 Q. So do you try to call every store manager on

14 Monday to kind of do a wrap-up of the last week's

15 business?

16 A. Try to. Or I'll send out a memo for sales,

17 what the focus items are over the week,

18 communications bulletin.

19 Q. SPEH we've talked about. That's something

20 that would normally be a piece of information the

21 store manager would review?

22 A. Yes.

23 Q. What's an order scorecard?

24 A. It breaks down the different categories in

25 the store, how much was ordered, what margin it is.

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1 what they have for me. It depends.
2 Q. Could you tell us -- and this may vary by
3 season. Could you give us a range of how many hours
4 a week you work?
5 A. Probably around 50. I mean, I'm always on
6 call. I mean, I could have a day off, I could get a
7 phone call and help somebody out. So, you know, I
8 can't pinpoint how many I have or how many hours I'm
9 spending.

10 Q. You're accessible to your store managers?

11 A. Try to be. You bet.

12 Q. Is it your job as a district manager, in the
13 way you perform the job at least, Mr. Tellstrom, to
14 run the individual stores?

15 A. No. I help guide.

16 Q. Is it possible for you to run the individual
17 stores?

18 A. No. No. I can't run 12.

19 Q. I'd like you to talk some about the store
20 managers that you have been supervising. Do you
21 view them as having strengths and weaknesses?
22 A. Yes.
23 Q. And John Hansen is one of those store
24 managers; is that right?
25 A. Correct.

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1 It's an ordering tool that the store manager should

2 use to know what drives their business. They

3 should --

4 Q. Whose -- sorry.

5 A. They should know what departments are their

6 No. 1 sellers so they can order it accordingly.

7 Q. Whose responsibility is it, Mr. Tellstrom, to

8 order for the store?

9 A. Store manager.

10 Q. Is that a responsibility that can be

11 delegated?

12 A. Sure.

13 Q. And to what level of employee would it be

14 delegated?

15 A. An assistant.

16 Q. What work is involved in ordering, and would

17 you talk about your personal experience as a store

18 manager, please.

19 A. Ordering, you can -- you can print the whole

20 order book. Sometimes it's up to 45, 63 pages, or

21 you can print a certain department. You look and

22 see what your on-hands are. If you have any

23 negatives, you want to make sure you order them.

24 Store manager knows what sells in their

25 store, they should be able to drive their business

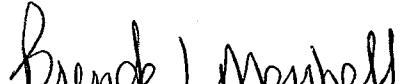
1 STATE OF CALIFORNIA)
2 County of Sonoma)
3

4 I, BRENDA L. MARSHALL, holding CSR License
5 No. 6939, a Certified Shorthand Reporter, licensed
6 by the State of California, hereby certify that,
7 pursuant to Notice to take the foregoing deposition,
8 said witness was by me duly sworn to tell the truth,
9 the whole truth and nothing but the truth in the
10 within-entitled cause; that the testimony of the
11 said witness was recorded by me by stenotype, and
12 that said deposition was, under my direction
13 thereafter, reduced to computer transcript and, when
14 completed, was available to said witness for
15 signature before any Notary Public.

16 I further certify that I am not of counsel or
17 attorney for either of the parties to said
18 deposition, nor in any way interested in the outcome
19 of the cause named in the caption.

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand this 27th day of November, 2007.

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BRENDA L. MARSHALL

Certified Shorthand Reporter
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